

Category	Deadline	Status
Completion of Search for documents responsive to Gang Profiling Request	April 1, ⁴ extended to April 15 ⁵	Still outstanding
Document and page counts for number of documents responsive to Gang Profiling Request	April 30 ⁶	Still outstanding
Initial Production of documents responsive to Gang Profiling Request	May 30 ⁷	June 8 (production of 99 pages)
Production of Policy Directives responsive to subpart #10 of Gang Profiling Request	“Soon” as of April 10 ⁸	Still outstanding ⁹
Firm deadline for completion of production of documents responsive to Gang Profiling Request	N/A	Still outstanding
Firm deadline for completion of production of documents responsive to WSO Request	N/A	Still outstanding

In the same footnote, Defendants also allege that “Plaintiffs are incorrect regarding the timeline that they suggest was promised for Defendants’ production of documents,” *id.*, but do not cite a single source to support their allegation. Plaintiffs have provided citations for each self-imposed deadline in the table above.

⁴ D. 13 at 4.

⁵ D. 17 at 3.

⁶ *Id.*

⁷ *Id.*

⁸ Oral representation by counsel for Defendants at 4/10/2020 status conference.

⁹ Defendants represent that they will produce 500 pages from the “groups of documents” that include the remainder of documents responsive to the WSO Request and documents responsive to subpart #10 of the Gang Profiling Request (5,460 pages total) by June 30. D. 23 at 2. Thus, it is unclear whether Defendants propose to produce documents responsive to both requests or to only one request on June 30. Regardless, pursuant to Defendants’ proposed schedule, they will not complete this subset of the document production *for almost another year*.

Because Defendants' own deadlines have not been effective to ensure Plaintiffs receive the requested documents in a timely manner, Plaintiffs request that the Court set firm deadlines for production for both the WSO Request and the Gang Profiling Request.

WSO Request: Defendants report that there are 181 documents totaling 829 pages remaining.¹⁰ Plaintiffs propose that Defendants produce all responsive, non-exempt documents to Plaintiffs by **July 15, 2020**, and produce an accompanying *Vaughn* index by **August 1, 2020**.

Gang Profiling Request: Plaintiffs sent the Gang Profiling Request in June 2019 – a full year ago – and have received only 99 pages of documents. Defendants have also failed to provide document and page counts for the Gang Profiling Request.¹¹ Plaintiffs propose that Defendants provide document and page counts for responsive documents by **June 12, 2020**. After providing these document and page counts, both Plaintiffs and Defendants should submit supplemental status updates to the court regarding a proposed schedule for completing the production. Plaintiffs further propose that Defendants respond to the following discrete categories of requests by **July 15, 2020**: #4 (East Boston High School documents), #7 (Operation Matador), and #10 (policy directives).

Date: June 9, 2020

Respectfully Submitted,

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¹⁰ Email from Defendants' counsel to Plaintiffs' counsel dated 5/29/2020.

¹¹ The one exception is the combined figure of 5,460 pages for the WSO Request and subpart #10 of the Gang Profiling Request. *See* n.9, *infra*.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing will be filed through the electronic filing system of the Court, which system will serve counsel of record, on June 9, 2020.

/s/ Lauren Godles Milgroom
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